

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

<b>JORDAN GREEN,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 3:24-cv-763-KHJ-MTP</b>
	)	
<b>AMAZON.COM SERVICES, LLC and</b>	)	
<b>KEVIN SMITH,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT AMAZON.COM SERVICES, LLC’S OBJECTIONS TO  
PLAINTIFF’S NOTICE DUCES TECUM TO TAKE THE FRCP 30(b)(6)  
DEPOSITION OF DEFENDANT**

COMES NOW Amazon.com Services, LLC (“Defendant”), by and through counsel, and provides its Objections to Plaintiff’s Notice Duces Tecum to Take the FRCP 30(b)(6) Deposition of Defendant propounded upon it by Plaintiff Jordan Green (“Plaintiff”). Defendant reserves the right to further supplement this objection.

**TOPICS FOR RULE 30(b)(6) DEPOSITION**

**TOPIC NO. 1:** The corporate representative’s knowledge of topics listed in Plaintiff’s 30(b)(6) notice.

**OBJECTION:** Subject to the objections asserted against the topics below, Defendant designates Senior Human Resources Manager Gary Stiteler and Senior Physical Security Program Manager Jennifer Goodwin.

**TOPIC NO. 2:** The corporate representative's preparation for his/her/their 30(b)(6) deposition.

**OBJECTION:** Defendant designates Senior Human Resources Manager Gary Stiteler and Senior Physical Security Program Manager Jennifer Goodwin.

**TOPIC NO. 3:** The identity, job titles and contact information of witnesses having knowledge of Plaintiff's employment, arrest, termination and claims and defenses asserted in this action.

**OBJECTION:** Defendant objects to Topic No. 3 as overly broad in that it seeks information regarding witnesses who might have knowledge of Plaintiff's employment, which could include anyone at JAN1, or Plaintiff's arrest, which could include any number of people at Madison County Sheriff's Department of District Attorney's Office, and to the extent it requires Defendant to speculate regarding witnesses that have knowledge of Plaintiff's employment, arrest, termination, and claims and defenses asserted in this action. Subject to and without waiving these objections, Defendant designates Mr. Stiteler.

**TOPIC NO. 4:** Any and all policies, procedures, rules, guidelines, codes of conduct, codes of ethics and any other standards applicable to retention of documents and surveillance videos.

**OBJECTION:** Defendant objects to Topic No. 4 as overly broad to the extent it seeks information regarding facilities other than JAN1. Subject to and without waiving this objection, Defendant designates Ms. Goodwin.

**TOPIC NO. 5:** Data preservation steps taken after learning of Plaintiff's legal claims and loss of destruction of any potentially relevant records.

**OBJECTION:** Defendant objects to Topic No. 5 to the extent it seeks information that is protected by attorney-client or attorney work product privilege, seeks information that is not relevant to any party's claim or defense or proportional to the needs of the case. Subject to and without waiving this objection, Defendant will produce Ms. Goodwin to testify regarding retention of video surveillance footage at JAN1.

**TOPIC NO. 6:** Any and all evidence related to Plaintiff's claims and AMAZON'S defenses.

**OBJECTION:** Defendant objects to Topic No. 6 on the grounds it is overly broad, calls for legal conclusions, and unduly burdensome. Subject to and without waiving these objections, Defendant designates Mr. Stiteler and Ms. Goodwin to testify regarding their knowledge of the topics in this Notice and their testimony will be used to support Amazon's defenses.

**TOPIC NO. 7:** Any and all information contained in Plaintiff's personnel file maintained by AMAZON.

**OBJECTION:** Defendant designates Mr. Stiteler to testify regarding Plaintiff's personnel documents.

**TOPIC NO. 8:** Plaintiff's employment history and job performance throughout his employment with AMAZON.

**OBJECTION:** Defendant objects to Topic No. 8 to the extent it seeks information that was part of settlement negotiations at the demand stage. Subject to and without waiving this objection, Defendant designates Mr. Stiteler.

**TOPIC NO. 9:** Disciplinary actions taken against Plaintiff during the course of his employment with AMAZON and AMAZON'S policies and procedures related to these disciplinary actions.

**OBJECTION:** Defendant designates Mr. Stiteler.

**TOPIC NO. 10:** AMAZON'S internal investigation, if any, of the October 26, 2023, vehicle burglaries and October 31, 2023, vehicle theft, including the identity of individuals involved in the investigation and documents generated during the course of the investigation.

**OBJECTION:** Defendant designates Ms. Goodwin.

**TOPIC NO. 11:** Training provided to employees who were involved in AMAZON'S internal investigation, if any, of the October 26, 2023, vehicle burglaries and October 31, 2023, vehicle burglaries and October 31, 2023, vehicle theft and oversight or supervision of those who participated in same.

**OBJECTION:** Defendant designates Ms. Goodwin.

**TOPIC NO. 12:** AMAZON'S communications with law enforcement officials.

**OBJECTION:** Defendant designates Ms. Goodwin.

**TOPIC NO. 13:** AMAZON'S communications with Plaintiff regarding the October 26, 2023, vehicle burglaries and October 31, 2023, vehicle theft.

**OBJECTION:** Defendant designates Ms. Goodwin.

**TOPIC NO. 14:** Surveillance footage, witness statements and internal reports related to Plaintiff's claims and AMAZON'S defenses.

**OBJECTION:** Defendant designates Ms. Goodwin.

**TOPIC NO. 15:** All facts and evidence relied upon in identifying Plaintiff as a suspect in the October 26, 2023, vehicle burglaries and October 31, 2023, vehicle theft.

**OBJECTION:** Defendant designates Ms. Goodwin.

**TOPIC NO. 16:** Any and all written and unwritten policies, procedures, rules, guidelines, codes of conduct, codes of ethics and any other standards that were applicable to warehouse, loss prevention, security, human resources and all other employees employees [SIC] at AMAZON's Warehouse in Canton, MS from and after January 2023.

**OBJECTION:** Defendant objects to Topic No. 16 as it is overly broad in seeking testimony regarding irrelevant policies, procedures, rules, guidelines, codes of

conduct, codes of ethics, and any other standards applicable to Amazon employees at JAN1. Subject to and without waiving this objection, Defendant designates Mr. Stiteler to testify regarding relevant, applicable policies, procedures, rules, guidelines, codes of conduct and codes of ethics applicable to employees at JAN1 from January 2023 to the present.

**TOPIC NO. 17:** Any and all written and unwritten policies, procedures, rules, guidelines, codes of conduct, codes of ethics and any other standards applicable to retention of documents, videos, employee data and all other records that were in effect from and after January 2023.

**OBJECTION:** Defendant objects to Topic No. 17 as being overly broad to the extent it seeks testimony regarding facilities other than JAN1 and to the extent it seeks testimony regarding irrelevant policies, procedures, rules, guidelines, codes of conduct, codes of ethics or other standards applicable to retention of documents, videos, employee data. Subject to and without waiving these objections, Defendant designates Mr. Stiteler to testify regarding relevant, applicable policies, procedures, rules, guidelines, codes of conduct, codes of ethics and other standards regarding retention of documents and employee data in effect at JAN1 from January 2023 to the present. Defendant designates Ms. Goodwin to testify regarding policies, procedures, rules, guidelines and other standards applicable to retention of videos in effect at JAN1 from January 2023 to the present.

**TOPIC NO. 18:** Any and all written and unwritten policies, procedures, rules, guidelines, codes of conduct, codes of ethics and any other standards for handling accusations involving the employee's potential criminal activity on AMAZON's campus that were in effect from and after January 2023.

**OBJECTION:** Defendant objects to Topic No. 18 as overly broad to the extent it seeks testimony regarding facilities other than JAN1. Subject to and without waiving this objection, Defendant designates Ms. Goodwin.

**TOPIC NO. 19:** Any and all written and unwritten policies, procedures, rules, guidelines, codes of conduct, codes of ethics and any other standards describing employees' rights during internal investigations of misconduct that were in effect from and after January 2023.

**OBJECTION:** Defendant objects to Topic No. 19 as overly broad to the extent it seeks testimony regarding facilities other than JAN1. Subject to and without waiving this objection, Defendant designates Ms. Goodwin.

**TOPIC NO. 20:** Termination of Plaintiff's employment and AMAZON's justification for delaying Plaintiff's reinstatement/rehiring.

**OBJECTION:** Defendant objects to Topic No. 20 to the extent it seeks information that is protected by attorney-client or attorney work product privilege. Subject to and without waiving this objection, Defendant designates Mr. Stiteler to testify regarding the termination of Plaintiff's employment and Plaintiff's

reinstatement/rehire with the exception of settlement negotiations at the demand stage.

**TOPIC NO. 21:** Any and all policies, procedures, rules, guidelines, codes of conduct, codes of ethics and any other applicable standards related to hiring, terminating, or disciplining applicants and employees who have been arrested but not convicted of a crime.

**OBJECTION:** Defendant objects to Topic No. 21 as overly broad to the extent it seeks information regarding facilities other than JAN1. Subject to and without waiving this objection, Defendant designates Mr. Stiteler to testify regarding termination and discipline for someone accused of theft on Amazon's property.

**TOPIC NO. 22:** Defendants' responses to Plaintiff's discovery requests.

**OBJECTION:** Defendant objects to Topic No. 22 on the grounds that the responses speak for themselves and objections to the responses were made by Defendant's counsel. Subject to and without waiving these objections, Defendant designates Mr. Stiteler.

**TOPIC NO. 23:** Federal, state, local and district, laws, codes, rules, regulations, policies and procedures related to claims and defenses asserted by either party in this lawsuit.

**OBJECTION:** Defendant objects to Topic No. 23 as it is overly broad in seeking testimony regarding any number of laws, is vague and ambiguous with regard to



“federal, state, local, and district...rules, regulations, policies, and procedures,” and it calls for legal conclusions or speculation. Defendant cannot testify regarding federal, state, local, or district laws, or codes. Subject to and without waiving these objections, Defendant designates Mr. Stiteler to testify regarding Amazon’s rules, regulations, policies, and procedures in effect at JAN1 from January 2023 to the present related to claims and defenses in this lawsuit.

**TOPIC NO. 24:** Actions taken by AMAZON to comply with anti-discrimination and anti-retaliation laws.

**OBJECTION:** Defendant designates Mr. Stiteler.

**TOPIC NO. 25:** The age, race, and employment status of all suspects in the October 26, 2023, vehicle burglaries and October 31, 2023, vehicle theft.

**OBJECTION:** Defendant designates Mr. Stiteler.

**TOPIC NO. 26:** The identity of employees depicted in surveillance videos produced by AMAZON.

**OBJECTION:** Defendant objects to Topic No. 26 as overly broad to the extent it seeks the identity of employees in surveillance videos produced by Amazon who are not relevant to the litigation. Subject to and without waiving this objection, Defendant designates Ms. Goodwin.

Date: August 13, 2025

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13<sup>th</sup> day of August, 2025, a copy of the foregoing document has been served on counsel of record via electronic mail to the following:

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/s/ Joseph Koury  
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